

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Subpoena *ad testificandum* to Boston Scientific Corporation in *Innovative Health, LLC v. Biosense Webster, Inc.*, Case No. 8:19-cv-1984 JVS (KESx) (C.D. Cal.)

Case No. 0:21-mc-57-NEB-TNL

DECLARATION OF BROOKS F. POLEY

I, Brooks F. Poley, being duly sworn, state as follows:

1. I am an attorney and shareholder at the law firm of Winthrop & Weinstine, P.A., and I am one of the attorneys representing Defendant Biosense Webster, Inc. (“Biosense”) in the above-entitled matter. I make this Declaration in Support of Defendant’s Memorandum in Opposition to Plaintiff’s Motion to Quash Subpoena *ad testificandum*.

2. Attached hereto as **Exhibit A** is a true and correct copy of an email from Lillian Grossbard to Martin Chester, dated July 23, 2021.

3. Attached hereto as **Exhibit B** is a true and correct copy of an email from Kiera Murphy to Lillian Grossbard, dated July 27, 2021.

4. Attached hereto as **Exhibit C** is a true and correct copy of an email from Lillian Grossbard to Kiera Murphy, dated July 29, 2021.

5. Attached hereto as **Exhibit D** is a true and correct copy of an Affidavit of Service, signed August 3, 2021.

6. Attached hereto as **Exhibit E** is a true and correct copy of an email from Kiera Murphy to Lillian Grossbard, dated August 3, 2021.

7. Attached hereto as **Exhibit F** is a true and correct copy of an email from Lillian Grossbard to Kiera Murphy and Martin Chester, dated August 10, 2021.

8. Attached hereto as **Exhibit G** is a true and correct copy of an email from Colleen Kozikowski to Kiera Murphy and Martin Chester, dated August 13, 2021.

9. Attached hereto as **Exhibit H** is a true and correct copy of an email from Martin Chester to Colleen Kozikowski, dated August 13, 2021.

10. Attached hereto as **Exhibit I** is a true and correct copy of an email from Martin Chester to Colleen Kozikowski, dated August 16, 2021.

11. Attached hereto as **Exhibit J** is a true and correct copy of an email from Kiera Murphy to Lillian Grossbard, dated August 20, 2021.

12. Attached hereto as **Exhibit K** is a true and correct copy of an email from Colleen Kozikowski to Kiera Murphy and Martin Chester, dated August 20, 2021.

Dated: September 16, 2021

WINTHROP & WEINSTINE, P.A.

By: /s/ Brooks F. Poley
Brooks F. Poley, #0185139